

Engineers Comments Regarding Surface Water Drainage

Application Reference:	LU/8/26/PL	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Kathryn Welch	Date of Review:	10/04/2026
Site Name:	St Catherines Roman Catholic Primary School Highdown Drive Littlehampton BN17 6HL		
Application Description:	Replacing part of the school field with a Multi Use Games Area (MUGA) - 92sqm of Duralawn surfacing with football pitch marking, 3m high fencing and gate, removal of existing wooden climbing frame and installation of 69sqm of Duralawn surfacing and 3 new wooden activity frames, tarmac resurfacing of 145sqm school playground with new line markings. This application is in CIL Zone 4 (Zero Rated) as other development.		
Assessment Number:	1		

Policy and Guidance Information
Arun District Council Surface Water Drainage Guidance (including design checklists) - https://www.arun.gov.uk/surfacewater Land Drainage Consent – https://www.westsussex.gov.uk/fire-emergencies-and-crime/dealing-with-extreme-weather/flooding/flood-risk-management/ordinary-watercourse-land-drainage-consent/ Arun District Council Land Drainage Byelaws - https://www.arun.gov.uk/byelaws/ Arun District Council surface water pre-commencement conditions - https://www.arun.gov.uk/planning-pre-commencement-conditions The National Standards for SuDS - https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds The SuDs Manual [C753] by CIRIA

Response	Objection
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References
The NPPF states that when determining any planning application, local planning authorities should ensure that flood risk is not increased elsewhere (paragraph 181, 182 and 187e). The PPG guides local planning authorities to refer to 'Sustainable drainage systems: non-statutory technical standards' [NsTS] and detailed industry guidance like The SuDS Manual [C753] by CIRIA to guide decisions about the design, maintenance, and operation of sustainable drainage systems for non-major development. The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025. This consultation has been primarily informed by the NSfS and The SuDS Manual.

Summary

This summary highlights if critical items aligning with each of the standards have been met. Critical items are highlighted in **bold** on our surface water drainage design checklist (linked above). A failure to address these will likely result in an **objection** to an objection to a full or reserved matters planning application.

If any of these items are inadequately addressed by the submission, then their correction may result in a redesign of the surface water drainage scheme. A redesign is likely to have site wide implications such as the potential for storage structures to increase in volume or plan area, or the provision of other important infrastructure to satisfy the NSfS set out below.

A full written explanation of the assessment and response is given in the consultation comments to the planning officer.

Standard	Assessment	Response
1. Runoff destination	Insufficient	Objection
2. Interception drainage	Insufficient	Further information
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Compliant	No objection subject to conditions
5. Amenity	Insufficient	No objection
6. Biodiversity	Insufficient	No objection
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient	No objection subject to conditions

Reviewed Plans

The following documents have been submitted and reviewed to inform this consultation with reference to surface water drainage:

- LOCATION PLAN
- PLAN PAGE 1 OF 1
- SITE PLAN
- LOCATION PLAN
- BLOCK PLAN
- PROPOSED MUGA AND PLAY AREA
- PROPOSED MUGA
- BLOCK PLAN
- PROPOSED FIELD AREA

Consultation comments to the planning officer

0. General

- 0.1. Whilst the proposed MUGA covers an area similar to the existing tarmac playground, the additional pitches are not natural grass and the engineered surface will require drainage. Therefore the development will require sustainable drainage in accordance with NPPF Paragraph 182.
- 0.2. The development is non major and the measures should be proportionate to the nature and scale of development.
- 0.3. A Sustainable Drainage Statement [SDS] is submitted in support of the planning application, together with the EA Flood Map for Planning which shows the present day flood zones for rivers and seas.
- 0.4. Note the site is within the outline of the EA future year flood risk zones from rivers and seas (Flood Zone 2 without defences) but is unlikely to raise issues of safe development and is not a Sequential Testing requirement.

1. Runoff destination

- 1.1. It is agreed that the system does not need to provide collection for non-potable reuse of rainwater.
- 1.2. The proposed method of discharge should be identified at full planning stage. Currently, the SDS proposes to discharge to ground but does not provide ground investigation to demonstrate this method is feasible. There is potentially an alternate outlet to a combined sewer, which is a lower priority under NSfS Standard 1, but this option has not been demonstrated to be feasible.
- 1.3. Guidance on ground investigation to support proposals to discharge to ground via infiltration is provided on Arun DC web pages here: <https://www.arun.gov.uk/surfacewater>.
- 1.4. Due to the type of infiltration feature proposed (shallow infiltration blanket), it may be possible to provide evidence to confirm the local subsoil / geology is suitable for infiltration potential and ground water levels by reference to information already available to provide a robust assessment at planning stage. The Applicant should contact the ADC Drainage Team for pre-application consultation if it is proposed to rely on existing information in lieu of undertaking site specific ground investigation at planning stage.
- 1.5. If discharge to ground is not viable and connection to discharge to a sewer is required, the available capacity should be established through capacity checks with the Statutory Sewerage Undertaker (Southern Water).
- 1.6. The runoff destination is not currently in accordance with the requirements of the NSfS Standard 1. Therefore, we **object** to the application

2. Interception drainage

- 2.1. Interception drainage would be provided by self-drained permeable surface, whether discharged to ground or conveyed to an outfall.
- 2.2. The current design appears to convey runoff from the pitches to an infiltration blanket beneath the MUGA, but it appears from the preliminary details the pitch surface may also be permeable.
- 2.3. The design should be clarified once the runoff destination is confirmed to ensure the proposals meet NSfS Standard 2.

3. Extreme rainfall and flooding

- 3.1. The national surface water flood mapping (RoFSW) shows high and medium flood risk within the area of works. This is interpreted as isolated ponding not connected to an overland flow route. The depth is below 200mm and the extent would be reduced by the incorporation of a sustainable

drainage system as part of the works. We are satisfied that the proposal to incorporate this flood water into the storage design for the system will not result in displaced flood water.

- 3.2. Calculations for the infiltration solution are provided for the design storm based upon an assumed rate of infiltration. This should be verified through site investigation or evidence provided to confirm the local geology together with a robust factor of safety for both infiltration potential and ground water levels.
- 3.3. If discharge to ground is not viable and connection to discharge to a sewer is required, the peak outflow rate should be a maximum of 5 times greenfield runoff rates and measures applied to mitigate risk of blockage to the flow control device.
- 3.4. Guidance is provided on ADC webpages - <https://www.arun.gov.uk/surfacewater>.
- 3.5. Management of extreme rainfall is not currently in accordance with the requirements of the NSfS Standard 3. Therefore, we **object** to the application.

4. Water quality

- 4.1. There are no proposed roof or trafficked areas. The water quality treatment provided by either discharge to ground via a permeable surface or discharge to a combined sewer via a permeable surface would be acceptable.

5. Amenity

- 5.1. No mitigation or specific design is proposed for amenity / multifunctionality and no assessment is provided on the amenity aspect for the sustainable drainage system.
- 5.2. However, due to the small scale of the development and use of the site, amenity value delivered through the sustainable drainage system is not required and an Exception to Standard 5 is allowable.

6. Biodiversity

- 6.1. A BNG assessment and design report is submitted in support of the application and proposes to create habitat on the school site separate to the sustainable drainage system.
- 6.2. No mitigation or specific design is proposed for biodiversity and no assessment is provided on the biodiversity aspect for the sustainable drainage system.
- 6.3. However, due to the small scale of the development and use of the site, biodiversity value delivered through the sustainable drainage system is not required and an Exception to Standard 6 is allowable.

7. Construction, operation, maintenance, decommissioning and structural integrity

- 7.1. A maintenance plan for the drainage system has not been submitted but the site is within a single ownership / management and this aspect can be the subject of a planning condition.

8. Suggested conditions / Overcoming the objection

- 8.1. As this is not a holding objection or a request for further information, requested conditions are not listed. If you are minded to approve this application, please reconsult engineers for a list of suggested conditions to ensure that the development is adequately drained and does not increase flood risk elsewhere.

8.2. The imposition of conditions at this stage rather than overcoming the objection could result in a circumstance where the condition cannot be discharged. In the event of attaching a condition that cannot be discharged, permission may be invalid or that condition could be deemed to be unreasonable.

8.3. If you are minded to allow the applicant additional time to submit further documents to support this application, then further evidence may overcome our objection. Please do not allow the applicant to submit further documents without prior discussion as to whether it will be possible for these to be assessed or influence your determination.

Drainage Impact on Other Planning Matters

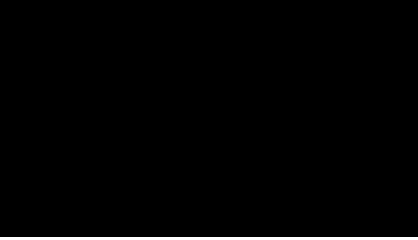
This application has been assessed with regards to surface water drainage design only, together with land drainage aspects if deemed necessary.

Other planning matters occasionally effect the surface water drainage design. If plans relating to other matters have been assessed for their impact on the proposed drainage, then it must not be assumed that they have been assessed for any other purpose. The planning officer is advised to check for conflicts with any existing approved plans and to consult any relevant consultees as appropriate.

It has been identified that the following consultees may have comments about the plans that have been submitted and reviewed for this application:

- ☐ Landscaping officer (proposed trees and landscaping)
- ☐ Tree officer (existing trees)
- ☐ Environment Agency (main rivers and fluvial/tidal flood risk, River Arun internal drainage board, groundwater source protection zones)
- ☐ Southern Water (foul drainage and surface water disposal to public sewer network/groundwater source protection zones)
- ☐ Portsmouth Water (groundwater source protection zones)
- ☐ Lead local flood authority (all other sources of flooding and ordinary watercourses)
- ☐ Other: Specify
- ☒ None

PL- Consultation- Engineers response



Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
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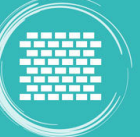
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Supporting our environment to support us



Fulfilling Arun's economic potential



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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 13 April 2026 11:17
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Kathryn Welch <Kathryn.Welch@arun.gov.uk>
Subject: RE: Planning Consultation on: LU/8/26/PL

Please find enclosed our consultants response, an objection.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 26 March 2026 11:48
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: LU/8/26/PL

To: **Engineers (Drainage)**

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NOTIFICATION FROM ARUN DISTRICT COUNCIL

Town & Country Planning Act 1990 (as amended)

Town and Country Planning (Development Management Procedure) (England) Order 2015

Planning Permission

Application No:	LU/8/26/PL
Registered:	26th March 2026
Site Address:	St Catherines Roman Catholic Primary School Highdown Drive Littlehampton BN17 6HL
Grid Reference:	502948 102986
Description of Works:	Replacing part of the school field with a Multi Use Games Area (MUGA) - 92sqm of Duralawn surfacing with football pitch marking, 3m high fencing and gate, removal of existing wooden climbing frame and installation of 69sqm of Duralawn surfacing and 3 new wooden activity frames, tarmac resurfacing of 145sqm school playground with new line markings. This application is in CIL Zone 4 (Zero Rated) as other development.

The Council have received the above application.

[Click here to view the application and documents](#) The website is updated once a day in the evening, so you may need to wait until the day after this notification to view the documents.

Should you have any comments to make, these should be sent by replying to this email by 30th April 2026 . You can also monitor the progress of this application through the Council web site:

<https://www.arun.gov.uk/planning-application-search>

The application will be determined having regard to the development plan policies (if any are relevant) and other material considerations. The development plan can be accessed via the website <https://www.arun.gov.uk/development-plan> as can information on what comments we can consider <https://www.arun.gov.uk/planning-application-comments>

Please be aware that any comments you may make will be available on our website so please do not insert personal details or signatures on your reply.

Should the application go to appeal the Planning Inspectorate will publish any comments made to the Council on their website: <https://acp.planninginspectorate.gov.uk/> but they will protect personal details.

In the absence of a reply within the period stated, I shall assume that you have no observations to make.

Yours sincerely

Kathryn Welch

Planning Officer- Arun District Council

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